



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

February 23, 1995

RE: HUKILL CHEMICAL CORP.
OHD 001 926 740
#02-18-0315

CERTIFIED MAIL

Mr. Michael Mraz
Plant Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Mraz:

Ohio EPA is in receipt of, and has reviewed, Hukill Chemical Corporation's (HCC) November 16, 1994, response to Ohio EPA's October 14, 1994, notice of violation letter (NOV). Ohio EPA shall respond to HCC's submittal in the same order as the violations were presented in the October 1994, NOV:

1. OAC Rule 3745-66-93(C)(1)(2)(3)(4) and (E)(1)(c)(e)(f):
Containment and detection of releases;

(This violation is applicable only to the four, 3,000 gallon "feed" tanks).

HCC has submitted the requested calculations. The calculations appear to indicate that the containment system found in the distillation area of the facility is placed upon a foundation or base capable of providing support for the four (4) tank systems, as is required by OAC Rule 3745-66-93(C)(2). Based on the aforementioned calculations and the Professional Engineer's certification provided in an earlier submittal, it appears that HCC has abated this portion of the violation.

HCC has elected to build a carbon steel tank dike in lieu of meeting the secondary containment coating standards. In your letter you state that HCC has proposed a June 1995 deadline for installation of the tank dike. Please note, that until such time as the carbon steel dike for the four 3,000 gallons tanks is installed, HCC will remain in violation of OAC Rule 3745-66-93(C)(1)(4) and 3745-66-93(E)(1)(a) through (f). Ohio EPA will allow the violation to remain outstanding through June 1995. Please note, however, that the tank dike must be installed and certified by that deadline.



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2. OAC 3745-66-92(A)(B) and (G): New tank system requirements; (This violation was incorrectly labeled as violation #3 in the October 1994 NOV).

HCC has submitted additional calculations/explanations to supplement the original tank assessments (tank V-6000 C, four 3,000 gallon feed tanks, and Disperser Tank) provided to Ohio EPA at the time of the September 1994 compliance evaluation inspection. HCC has failed to provide the following, as is required by OAC Rule 3745-66-92(B):

The owner or operator of a new tank system must ensure that proper handling procedures are adhered to in order to prevent damage to the system during installation. Prior to covering, enclosing, or placing a new tank system or component in use, an independent, qualified installation inspector or an independent, qualified, registered professional engineer, either or whom is trained and experienced in the proper installation of tank systems, must inspect the system or component for the presence of any of the following items: weld breaks, punctures, scrapes of protective coatings, cracks, corrosion, and other structural damage or inadequate construction or installation.

Your letter states "No written statements or contracts exist for the installation of these tanks. The tanks have been in service for at least several years with no apparent problems structurally". (Specifically, you were referring to the V-6000 C and the four 3,000 gallon tanks).

HCC is unable to provide the Ohio EPA with an installation inspection of these tanks by an independent party, as is required by this rule. Ohio EPA will, however, return HCC to compliance with this rule, since as you stated, the tanks have been in use for several years without incident, HCC feels confident that HCC Maintenance personnel are experienced in tank installation, and no written statements exist for the installation of the tanks. In the future, HCC must meet the aforementioned requirement prior to placing any hazardous waste tanks into service at the facility.

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Regarding the Disperser Tank, HCC has not provided any calculations which support the claim that the Disperser Tank has sufficient structural strength to ensure that it will not collapse, rupture or fail during fuel blending activities. Your letter states, in part, that "the 1,000 gallon Disperser Tank was built for high shear mixing forces. The 1/4 inch thick shell is certainly strong enough to hold the weight of the full tank of liquid. The Professional Engineer's signed statement, dated August 1, 1994, for the certification of the support slab and the 1,000 gallon Disperser Tank was provided in the draft tank assessments submitted to you".

Ohio EPA had previously reviewed the draft tank assessments provided by HCC for the Disperser Tank, but requested the additional calculations in it's October 14, 1994 NOV because HCC has never provided calculations to show that the Disperser Tank has the structural integrity to carry the load. The tank was visibly assessed on August 1, 1994, by Mr. Stanley Haw, P.E., who states in his certification that, "The vessel and its support slab were evaluated and found to be structurally adequate for its present service." Although I discussed the ability of the Disperser Tank to handle the high shear mixing forces for which it was made with Mr. Haw, the calculations he based his certification upon, or the rationale he used to base his decision on, should have been provided in writing.

In summary, HCC has provided a written certification for the Disperser Tank based upon a registered professional engineer's visual observations/assessments of the tank while in service. Ohio EPA will accept the P.E.'s certification that the tank will not collapse, rupture or fail when in use, and that the vessel is capable of performing the duties for which it has been placed into service.

Based upon the calculations provided, brief explanations, and the signed Professional Engineer's certifications previously submitted, it appears that HCC has abated the above cited violation first noted in Ohio EPA's October 14, 1994 NOV, for tanks V-6000-C, the four 3,000 gallon tanks, and the Disperser Tank.

Please provide a time line that will be followed for installation of the new tank dike within forty-five (45) days of receipt of this letter.

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Should you have any additional questions, please do not hesitate to call me at (216) 963-1162.

Sincerely,

Marlene M. Emanuelson

Marlene M. Emanuelson
Environmental Scientist
Division of Hazardous Waste
Management

MME/fwn

cc: Frank Popotnik, DHWM, NEDO
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